

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

BRIAN WUOTI; KAITLYN WUOTI;  
MICHAEL GANTT; and REBECCA GANTT,  
Plaintiffs,

v.

CHRISTOPHER WINTERS, in his official  
Capacity as Commissioner of the Vermont  
Department for Children and Families, ARYKA  
RADKE, in her official capacity as Deputy  
Commissioner of the Family Services Division,  
and STACEY EDMUNDS, in her official capacity  
as Director of Residential Licensing  
and Special Investigations,  
Defendants.

No. 2:24-cv-00614-wks

**STIPULATED MOTION FOR PROTECTIVE ORDER**

The parties, by and through counsel, hereby request the Court enter the attached proposed stipulated protective order pursuant to F.R.C.P. 26(c). In support of the motion, Defendants offer the following:

1. Plaintiffs have propounded two sets of discovery requests on Defendants, on November 5, 2024, and March 8, 2025.
2. Defendants responded to Plaintiffs' first set of discovery requests on December 10, 2024, and supplemented their response on January 10, 2025. Discovery is ongoing, and Defendants have not yet produced all material responsive to all of Plaintiffs' discovery requests.
3. The set of documents responsive to Plaintiffs' requests for production includes documents which are confidential under Vermont law, including records concerning abuse and neglect, *see* 33 V.S.A. § 4921, and information pertaining to applicants for or recipients of assistance or benefits, *see* 33 V.S.A. § 111, and records which are confidential pursuant to the federal Child Abuse Prevention and Treatment Act, as amended, *see* 42 U.S.C. § 5601a(b)(2)(B)(viii).

4. Counsel for the parties have conferred regarding a potential protective order addressing confidentiality of discovery materials and have agreed upon the terms of the attached proposed stipulated protective order.
5. Insofar as it will preclude unnecessary dissemination of confidential records, the proposed protective order will protect individuals included in confidential Department for Children and Families records from annoyance, embarrassment, oppression, or undue burden which could otherwise result from broad disclosure of confidential records which include them.

Accordingly, the parties respectfully request the Court adopt the attached proposed stipulated protective order.

DATED at Montpelier, Vermont, this 22<sup>nd</sup> day of April, 2025.

BRIAN WUOTI, KAITLYN WUOTI,  
MICHAEL GANTT, REBECCA GANTT

STATE OF VERMONT

CHARITY R. CLARK  
ATTORNEY GENERAL

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Counsel for Defendant

SO ORDERED.

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Date

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Judge William K. Sessions III